

FILED

United States District Court

SEP 30 2005

MIDDLE

DISTRICT OF

ALABAMA

CLERK

U. S. DISTRICT COURT
MIDDLE DIST. OF ALA.

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT**OSCAR HERNANDEZ MARTINEZ,
ENRIQUE DEL PILAR RUEDES,
ANTONIO RUIZ GAYTAN, and
CHRISTIAN PEREZ**CASE NUMBER: 2:05 MJ/116-CSC

(Name and Address of Defendant)

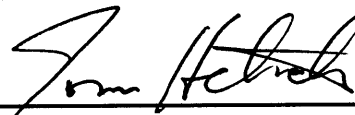
I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about September 7, 2005, in Montgomery county and elsewhere within the Middle District of Alabama defendant(s) did, (Track Statutory Language of Offense)

knowingly produced and possessed US Social Security cards and resident alien cards, knowing them to be forged, counterfeited, altered, or falsely made, or to have otherwise been procured by fraud or unlawfully obtained,

in violation of Titles 18 & 42 United States Code, Section(s) 1546(a) & 408(a)(7). I further state that I am a(n) Federal Bureau of Investigation Special Agent and that this complaint is based on the following facts:

Official Title

SEE THE ATTACHED AFFIDAVIT WHICH IS INCORPORATED BY REFERENCE

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Signature of Complainant

Sworn to before me and subscribed in my presence,

September 30, 2005

Date

at Montgomery, Alabama

City and State

Charles S. Coody, U.S. Magistrate Judge

Name and Title of Judicial Officer


Signature of Judicial Officer

AFFIDAVIT

I, Thomas Paul Hetrick, hereby make the following statement under penalty of perjury. I have been a Special Agent of the Federal Bureau of Investigation (FBI) for 9 years. During this period, I have been assigned numerous criminal cases including wire fraud, document fraud, civil rights, money laundering, bank robbery, and domestic terrorism. The following information is personally known to me, or provided to me by other law enforcement officers and other witnesses.

1. On or about September 7, 2005, the Montgomery Resident Agency of the FBI received an anonymous letter stating that individuals associated with Evergreen Estates in Montgomery, Alabama, were involved in the production and sale of counterfeit documents. The letter stated that these individuals would produce counterfeit social security cards and counterfeit resident alien cards for \$170.00. The letter stated that the individuals involved with this activity included Laura Magno and Tiburcio Guzman. The letter stated that the production of false documents is associated with 5004 Stone Pine Drive and 5006 Long Leaf Pine, both in the Evergreen Estates Mobile Home Park, 4590 Troy Highway, Montgomery, Alabama.

2. The letter included photocopies of business cards, containing information on who to contact for the purpose of obtaining "work documents." One of these business cards included the name Perez with a telephone number of 334-294-6763.

3. On September 28, 2005, at 9:00 am, Federal search warrants were signed in the Middle District of Alabama for property at 5008 Loblolly Pine Drive, Montgomery, Alabama, and 5004 Stone Pine Drive, Montgomery, Alabama. In addition, a Federal search warrant was signed in the Middle District of Alabama for two automobiles associated with the above

addresses. One of these vehicles was a 2000 Dodge Stratus bearing Alabama license plate 3B2196P.

4. On September 28, 2005, at 9:30 am, Federal search warrants were executed at 5008 Loblolly Pine Drive, Montgomery, Alabama, and 5004 Stone Pine Drive, Montgomery, Alabama. At the 5008 Loblolly Pine Drive address, law enforcement officers located a separate room used for making counterfeit documents. The room contained a number of counterfeit social security cards in various stages of production. The room contained various types of glue, cutters, printers, and tape used in making counterfeit social security cards and resident alien cards. For example, the property at 5008 Loblolly included an Epson Stylus CX4600 scanner and an Eltron P310 card printer. In addition, law enforcement officers found dozens of pictures, dozens of blank cards, dozens of tools, and a digital camera that all could be used in the production of counterfeit documents. Law enforcement officers also found \$5300.00 in cash and plastic laminate with Department of Justice insignia on it. At the end of this affidavit are photographs taken at the scene.

5. On September 7, September 14, and September 21, 2005, law enforcement officers through a Confidential Informant (CI), purchased four sets of counterfeit social security and immigration documents. Information from the CI, along with surveillance conducted by law enforcement officers established that individuals known to the CI as Oscar and Kike and another individual later identified as Antonio Gaytan, were present and took part in various steps in producing and delivering the fraudulent documents. These transactions are those that are described in more particularity within the search warrant affidavit filed in support of the search warrant executed on September 29, 2005.

6. In the home of 5008 Loblolly Pine Drive, law enforcement officers located Christian Perez, date of birth 12/23/1970. In a post-Miranda interview that was conducted in Spanish, Perez stated that he has been involved in the production of counterfeit documents. Perez stated his job was to find people that needed cards and helped deliver cards after they were made by two other individuals named Kike and Antonio. These two individuals were later identified to be Enrique Del Pilar Ruedas and Antonio Ruiz Gaytan. Perez stated that he would see Ruedas and Gaytan go into the room where the documents were made and come out with counterfeit cards.

7. At approximately 2:30 pm, law enforcement officers located one of the vehicles for which a search warrant had been issued, the 2000 Dodge Stratus bearing Alabama license plate 3B2196P. After conducting a traffic stop, law enforcement officers located four individuals in the vehicle. The four individuals were Enrique Del Pilar Ruedas, date of birth 03/03/1978; Antonio Ruiz Gaytan, date of birth 12/23/1953; Oscar Hernandez Martinez, date of birth 10/12/1970; and a 15 year old male juvenile. These individuals had the following cellular telephones on their persons: 334-294-6763 was in Ruedas' possession; 334-294-3565 was in Martinez' possession; and 334-294-3574 in Gaytan's possession.

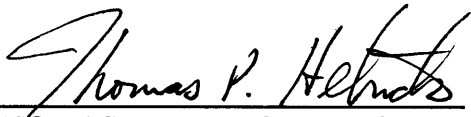
8. In post-Miranda interviews conducted in Spanish, two of the individuals, Oscar Hernandez Martinez and Enrique Del Pilar Ruedas, admitted to being involved in the production of counterfeit social security cards and resident alien cards. In his interview, Antonio Ruiz Gaytan asked for an attorney and the questioning of Gaytan ceased. The 15 year old male juvenile was identified and released to the Montgomery Police Department Juvenile Division.

9. In his post-Miranda interview, Oscar Hernandez Martinez stated that he was the driver for the document production scheme. He would drive to locations and take pictures of people

and bring the pictures back to the trailer for counterfeit documents to be produced. He would also deliver the final counterfeit documents to individuals.

10. In his post-Miranda interview, Enrique Del Pilar Ruedas stated that he would go to Birmingham to pick up the material to make the cards. He stated that all of the cards were made by a man named El Pelon, not further identified.

11. In his post-Miranda interview, Antonio Ruiz Gaytan asked to speak with an attorney. At the property at 5008 Loblolly Drive, law enforcement officers located a counterfeit social security card bearing the name of Antonio Ruiz Gaytan and SSN 655-12-2098. Also located was a counterfeit resident alien card in the name of Antonio Ruiz Gaytan with a picture of the same Antonio Ruiz Gaytan found in the Dodge Stratus by law enforcement officers.


THOMAS P. HETRICK, Special Agent
Federal Bureau of Investigation

Sworn to and subscribed in my presence
this 30th day of September, 2005.


CHARLES S. COODY
UNITED STATES MAGISTRATE JUDGE





